Part 10

EPA-RG-2014-004884

Print Form

T918
V.1

AIR, PESTICIDES, AND TOXICS
6TH FLOOR RECORDS CENTER
INFILING / NEW FILE FORM

New File ☐ OR Infiling ☒

Choose from the file types below:

AIR FACILITY:

(☐) AR - Acid Rain

(☐) CB - Confidential Business

(☐) CO - Compliance
(☐) EN - **Enforcement
(☐) GE - General
(☒) PE - Permit
(☐) RA - Regulatory Applicability
(☐) Other _____

TSCA:

(☐) AH - Asbestos Hazard Emergency Response Act
(☐) AS or AW - Asbestos or Asbestos Worker Protection
(☐) CB - Confidential
(☐) FI - Site Specific
(☐) FO - Non Site Specific
(☐) IM - **Section 5 & 8
(☐) LB - **Lead
(☐) PC - **PCB

** Extension of file type (if needed): (☐) ES - Enforcement Sensitive
(☐) DO - Docket Number

EPCRA / SARA (☐) ***FIFRA*** (☐)

EPA Registry I.D.

Current FRS Number: 110000462918
(Found in EnviroFacts)

Facility Name & Physical Address: KaneKa North America LLC
6161 Underwood Rd,
Pasadena, TX. 77507

Remarks: aKa: KaneKa Texas Corp,

Requestor's Name & Phone Number:
Les Koval X6733

Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9th Floor Records Center.

AIRS - Aerometric Information Retrieval System
ATO - Air Toxics
EMR - Emergency Response
ENF - Enforcement -
ENF 5-5-1 requires Month and Fiscal Year accompany file code.
ENF 5-6-5 requires Fiscal Year accompany file code.
EXR - External Relations
GEO - Geographical Summary Data
GRA - Grants Administration
The majority of this section requires the Fiscal Year accompany file code.
Project Officer Grants require the Grant number and Fiscal Year accompany file code.
LAB - Laboratory Support
LBP - Lead Based Paint
LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.
LEL - Legal and Legislative
MON – Monitoring NES - National Emission Standards
NSP - New Source Performance
NSR - New Source Review
OPP - Operating Permits Program
PEA - Permits Administration Program
PES - Pesticides
PLA - Planning
PUA - Public Affairs
RAD - Radiation
RGR - Resource Conservation and Recovery Act - Regulatory Development
RDE - Research and Development
REG - Registration
SIP - State Implementation Plan
SUP - Superfund
TITL - Title III
TSC - Toxic Substance Control
TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.
TSU - Technical Support
VRP - Voluntary Reduction Program

Kaneka
Kaneka North America LLC

6161 Underwood Road
Pasadena, TX 77507

January 25, 2013

CERTIFIED MAIL # 7011 0110 0002 1144 9569
Whitney Hill
Air Permit Initial Review Team
Texas Commission On Environmental Quality
MC161, P.O. Box 13087
Austin, Texas 78711-3087

Re: Minor Revision Application
Kaneka North America, LLC (KNA)
Account No. HG-1065-E
Federal Operating Permit No. O-3394

Dear Ms. Hill:

Enclosed you will find forms to be included with the previously submitted minor revision application packages (Project Nos. 18905 and 18941). As you discussed in a telephone conversation with Carl Schnitz on January 24, 2013, the enclosed changes are to be included in the next working draft permit issued to KNA for review.

The following forms are included in this submittal:

1. OP-REQ1 – Page 4 of the OP-REQ1 is being submitted to correct the representation regarding VOC wastewater streams. KNA is an affected source, however, the waste streams at Kaneka MS Polymer Division are not affected streams.
2. OP-MON forms are being submitted to adjust the periodic monitoring language regarding the storage tank liquid level. Also, the periodic monitoring requirement for tank T-S503 has been changed to reflect the modification of the tank to meet the submerged fill pipe standard.
3. OP-ACPS is being submitted to remove the compliance schedule currently in FOP O-3394 for requirements related to MACT Subpart FFFF. All items on the schedule are complete and the compliance schedule is no longer needed.

As discussed in the above referenced telephone conversation, an OP-CRO1 will be submitted upon request. If you have any questions about the submittal, please contact me via e-mail at Katherine.riemann@kaneka.com or by telephone at (281) 474-1887.

Sincerely,

Katherine Riemann
Air Compliance Superintendent
Kaneka North America, LLC

cc: Air Program Manager — 7011 0110 0002 1144 9545
TCEQ
Region 12
5425 Polk, Suite H
Houston, Texas 77027-1423

Environmental Protection Agency, Region 6 — 7011 0110 0002 1144 9552
Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Form OP-REQ1
Application Area-Wide Applicability and General Information

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1 (Page 4)
Federal Operating Permit Program

Date: 1/25/2013	RN No.: RN100218841	Permit No.: O3394
Area Name: Kaneka MS Polymer Division		

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

III.	**TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs)** ***(continued)***		
	C.	**Industrial Wastewater**	
	1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. *If the response to Question III.C.1 is "NO" or "N/A", go to Section III.D.*	☐ YES ☒ NO ☐ N/A
	2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. *If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.*	☐ YES ☐ NO
	3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). *If the response to Question III.C.3 is "YES", go to Section III.D.*	☐ YES ☐ NO
	4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). *If the response to Question III.C.4 is "YES", go to Section III.D.*	☐ YES ☐ NO
	5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	☐ YES ☐ NO
	6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	☐ YES ☐ NO
	7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	☐ YES ☐ NO
	D.	**Loading and Unloading of VOCs**	
♦	1.	The application area includes VOC loading operations.	☒ YES ☐ NO
♦	2.	The application area includes VOC transport vessel unloading operations. *For GOP applications, if the responses to Questions III.D.1 - D.2, are "NO", go to Section III.E.*	☒ YES ☐ NO

Form OP-MON
Monitoring Requirements

Monitoring Requirements
Form OP-MON (Page 2) Federal
Operating Permit Program

Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: **HG-1065-E**	B. RN No.: **100218841**	C. CN No.: **604059352**
D. Permit No.: **O3394**	E. Project No.:	F. Area Name: **Kaneka MS Polymer Division**
G. Company Name: **Kaneka North America LLC**		

II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.: **T-S106**	C. Applicable Form: **OP-UA3, and OP-UA15**

III. APPLICABLE REGULATORY REQUIREMENT	
A. Name: **Chapter 115**	B. SOP Index No.:
C. Pollutant: **VOC**	D. Main Standard: **115.112**
E. Monitoring Type: **PM**	F. Unit Size: **Small**
G. Deviation Limit: **Minimum tank level = 4% of tank capacity except during maintenance of the tank**	

IV. CONTROL DEVICE INFORMATION	
A. Device ID No.: **N/A**	B. Device Type: **OTH**

V. CAM CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. QA/QC Procedures:		
E. Verification Procedures:		
F. Representative Data:		

VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator: **Measured tank level**	B. Minimum Frequency: **Continuous**	C. Averaging Period: **Daily**

D. Periodic Monitoring Text:

The submerged fill pipe used to control emissions from this tank reaches to 20 inches above the actual bottom of the tank. The tank utilizes an interlock system which prevents the tank from emptying below 5% of total capacity of the tank. At this level the liquid in the tank is at 15 inches above the bottom of the tank. This meets the control requirement by placing the fill pipe at 5 inches from the effective bottom of the tank. The interlock system can only be overridden manually and this would only occur during maintenance of the tank. Periodic monitoring of the tank level to verify that the interlock system is working demonstrates proper operation of the control device (submerged fill pipe).

The level instrument readings are monitored by the DCS continuously and have alarms set to alert operators if the readings get close to 4% so that action can be taken before the interlock is activated. Furthermore, the readings are recorded by the plant data historian. MS Polymers division is proposing to maintain the level instrumentation such that it operates 95% of the time to ensure compliance with the standard. All occurrences of a tank level below 4% which do not occur during maintenance of the tank will be reported on the semi-annual deviation report.

The readings of tank level stored in the data historian will be maintained for a period of five years.

Monitoring Requirements
Form OP-MON (Page 2) Federal
Operating Permit Program

Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: **HG-1065-E**	B. RN No.: **100218841**	C. CN No.: **604059352**
D. Permit No.: **O3394**	E. Project No.:	F. Area Name: **Kaneka MS Polymer Division**
G. Company Name: **Kaneka North America LLC**		

II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.: **T-S107**	C. Applicable Form: **OP-UA3, and OP-UA15**

III. APPLICABLE REGULATORY REQUIREMENT	
A. Name: **Chapter 115**	B. SOP Index No.:
C. Pollutant: **VOC**	D. Main Standard: **115.112**
E. Monitoring Type: **PM**	F. Unit Size: **Small**
G. Deviation Limit: **Minimum tank level = 4% of tank capacity except during maintenance of the tank**	

IV. CONTROL DEVICE INFORMATION	
A. Device ID No.: **N/A**	B. Device Type: **OTH**

V. CAM CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. QA/QC Procedures:		
E. Verification Procedures:		
F. Representative Data:		

VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator: **Measured tank level**	B. Minimum Frequency: **Continuous**	C. Averaging Period: **Daily**

D. Periodic Monitoring Text:

The submerged fill pipe used to control emissions from this tank reaches to 20 inches above the actual bottom of the tank. The tank utilizes an interlock system which prevents the tank from emptying below 5% of total capacity of the tank. At this level the liquid in the tank is at 15 inches above the bottom of the tank. This meets the control requirement by placing the fill pipe at 5 inches from the effective bottom of the tank. The interlock system can only be overridden manually and this would only occur during maintenance of the tank. Periodic monitoring of the tank level to verify that the interlock system is working demonstrates proper operation of the control device (submerged fill pipe).

The level instrument readings are monitored by the DCS continuously and have alarms set to alert operators if the readings get close to 4% so that action can be taken before the interlock is activated. Furthermore, the readings are recorded by the plant data historian. MS Polymers division is proposing to maintain the level instrumentation such that it operates 95% of the time to ensure compliance with the standard. All occurrences of a tank level below 4% which do not occur during maintenance of the tank will be reported on the semi-annual deviation report.

The readings of tank level stored in the data historian will be maintained for a period of five years.

Monitoring Requirements
Form OP-MON (Page 2) Federal
Operating Permit Program

Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.: **HG-1065-E**	B. RN No.: **100218841**	C. CN No.: **604059352**
D. Permit No.: **O3394**	E. Project No.:	F. Area Name: **Kaneka MS Polymer Division**
G. Company Name: **Kaneka North America LLC**		

II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.: **T-S713**	C. Applicable Form: **OP-UA3, and OP-UA15**

III. APPLICABLE REGULATORY REQUIREMENT	
A. Name: **Chapter 115**	B. SOP Index No.:
C. Pollutant: **VOC**	D. Main Standard: **115.112**
E. Monitoring Type: **PM**	F. Unit Size: **Small**
G. Deviation Limit: **Minimum tank level = 4% of tank capacity except during maintenance of the tank**	

IV. CONTROL DEVICE INFORMATION	
A. Device ID No.: **N/A**	B. Device Type: **OTH**

V. CAM CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. QA/QC Procedures:		
E. Verification Procedures:		
F. Representative Data:		

VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator: **Measured tank level**	B. Minimum Frequency: **Continuous**	C. Averaging Period: **Daily**

D. Periodic Monitoring Text:

The submerged fill pipe used to control emissions from this tank reaches to 20 inches above the actual bottom of the tank. The tank utilizes an interlock system which prevents the tank from emptying below 5% of total capacity of the tank. At this level the liquid in the tank is at 15 inches above the bottom of the tank. This meets the control requirement by placing the fill pipe at 5 inches from the effective bottom of the tank. The interlock system can only be overridden manually and this would only occur during maintenance of the tank. Periodic monitoring of the tank level to verify that the interlock system is working demonstrates proper operation of the control device (submerged fill pipe).

The level instrument readings are monitored by the DCS continuously and have alarms set to alert operators if the readings get close to 4% so that action can be taken before the interlock is activated. Furthermore, the readings are recorded by the plant data historian. MS Polymers division is proposing to maintain the level instrumentation such that it operates 95% of the time to ensure compliance with the standard. All occurrences of a tank level below 4% which do not occur during maintenance of the tank will be reported on the semi-annual deviation report.

The readings of tank level stored in the data historian will be maintained for a period of five years.

Monitoring Requirements
Form OP-MON (Page 1) Federal
Operating Permit Program

Table 1a: CAM/PM Additions

I. IDENTIFYING INFORMATION		
A. Account No.: HG-1065-E	B. RN No.: 100218841	C. CN No.: 604059352
D. Permit No.: O3394	E. Project No.:	F. Area Name: Kaneka MS Polymer Division
G. Company Name: Kaneka North America LLC		

II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.: T-S503	C. Applicable Form: OP-UA3 and OP-UA15

III. APPLICABLE REGULATORY REQUIREMENT	
A. Name: Chapter 115	B. SOP/GOP Index No.:
C. Pollutant: VOC	D. Main Standard: 115.112

IV. TITLE V MONITORING INFORMATION		
A. Monitoring Type: PM	B. Unit Size: SMALL	C. CAM/PM Option No.: PM-V-060

D. Deviation Limit:

N/A

E. CAM/PM Option No

F. Deviation Limit:

V. CONTROL DEVICE INFORMATION	
A. Device ID No.: N/A	B. Device Type: OTH

Form OP-ACPS
Application Compliance Plan and Schedule

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 1/25/2013	Regulated Entity No.: RN100218841	Permit No.: O-3394
Company Name: Kaneka North America LLC		Area Name: Kaneka MS Polymer Division

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(e)(9).

Part 1

A.	**Compliance Plan — Future Activity Committal Statement**
The *Responsible Official* commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.	

B.	**Compliance Certification — Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)**	
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☐ YES ☒ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	
*	*For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.* *For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.* *Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.*	